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*Attorneys for Plaintiffs Full Circle of Living
and Dying; Bonnie "Akhila" Murphy; Donna
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Donaldson; and Robin Mallgren*

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

FULL CIRCLE OF LIVING AND
DYING, et al.,

Plaintiffs,

v.

GINA SANCHEZ in her official capacity as
Bureau Chief of the Cemetery and Funeral
Bureau, et al.,

Defendants.

No. 2:20-cv-01306-KJM-KJN

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
SUMMARY JUDGMENT**

Date: December 17, 2021
Time: 10:00 a.m.
Courtroom: 3, 15th Floor
Judge: Hon. Kimberley J. Mueller

1 PLEASE TAKE NOTICE that on December 17, 2021, at 10:00 a.m. in the above-entitled
2 Court, Plaintiffs Full Circle of Living and Dying; Bonnie “Akhila” Murphy; Donna Peizer; Pamela
3 Yazell; Kay Hogan; Janaia Donaldson; and Robin Mallgren will, and hereby do, move for
4 summary judgment on all their claims pursuant to Rule 56 of the Federal Rules of Civil Procedure.
5 Plaintiffs’ motion is made on the ground that there is no genuine dispute as to any material fact
6 and that Plaintiffs are entitled to judgment as a matter of law on all of their claims.

7 This motion is based on this Notice and the accompanying Memorandum of Points and
8 Authorities; Statement of Undisputed Material Facts; Declarations (with attached exhibits) of
9 Jeffrey Rowes, Bonnie “Akhila” Murphy, Donna Peizer, Pamela Yazell, Janaia Donaldson, and
10 Kay Hogan; all pleadings and papers on file in this action; and upon such other argument and
11 additional evidence as may be presented to the Court prior to or at the time of hearing.

12 Consistent with the Court’s standing order on civil motions, counsel for Plaintiffs and
13 Defendants met and conferred both at a virtual conference on Monday, November 15, 2021, and
14 by email to discuss the substance of their respective motions for summary judgment. They were
15 unable to come to a resolution and have exhausted those efforts.

16 Dated: November 19, 2021.

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that a copy of the foregoing was served on all counsel of record via the Court's CM/ECF system on all counsel of record.

/s/ Jeff Rowes
Jeff Rowes

Attorney for Plaintiffs